

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**FEDERAL TRADE COMMISSION,
STATE OF ILLINOIS, and
STATE OF MINNESOTA,**
Plaintiffs,
v.
**GTCR, LLC,
GTCR BC HOLDINGS, LLC, and
SURMODICS, INC.,**
Defendants.

Case No. 1:25-cv-02391

Hon. Jeffrey I. Cummings

**JOINT MOTION FOR ENTRY OF [PROPOSED] STIPULATED ORDER TO AMEND
PLAINTIFFS' REPLY MEMORANDUM WORD LIMIT**

Plaintiffs Federal Trade Commission (the “Commission”), the State of Illinois, and the State of Minnesota (collectively, “Plaintiffs”) and Defendants GTCR, LLC, GTCR BC Holdings, LLC, and Surmodics, Inc. (“Surmodics”) (collectively, “Defendants”) respectfully move this Court for an order amending the word limit for Plaintiffs’ reply memorandum in further support of their motion for a preliminary injunction in the Agreed Case Management Order from 6,500 words to 8,500 words. *See* ECF No. 71. The parties jointly agree to this amendment to enable Plaintiffs to address Defendants’ proposed divestiture agreement and associated contracts, which were not yet available at the time Plaintiffs’ Memorandum of Law in Support of Their Motion for a Preliminary Injunction was filed and for which discovery is ongoing, in their reply memorandum.

Plaintiffs intend to file their reply memorandum by August 12, 2025. The parties respectfully request that the Court enter the submitted proposed order as soon as practicable.

July 25, 2025

Respectfully submitted,

/s/ Maia Perez

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CERTIFICATE OF SERVICE

Pursuant to Local Rule 5.9, I hereby certify that on this 25th day of July 2025, the foregoing was electronically filed using the Court's CM/ECF system and constitutes service to the attorneys of record who have consented to accept service by electronic means and that GTCR, LLC's, GTCR BC Holdings, LLC's, and Surmodics, Inc.'s counsel of record are being served with a copy of this document via electronic mail.

Dated: July 25, 2025

/s/ Maia Perez
Maia Perez